

## Exhibit D: Medical Monitoring Class Definition

**23(b)(3) Medical Monitoring Independent Claim Class**

All individuals residing in Alaska; Arizona; Arkansas; California; Colorado; District of Columbia; Florida; Hawaii; Idaho; Maine; Massachusetts; Minnesota; Montana; New Mexico; Pennsylvania; South Dakota; Utah; West Virginia; and Wyoming and who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.

**23(b)(2) Medical Monitoring (Physical Injury Required) Remedy Subclass**

All individuals residing in Alabama; Connecticut; Delaware; Georgia; Illinois; Iowa; Kentucky; Louisiana; Michigan; Nebraska; Oklahoma; Oregon; and Wisconsin who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.

**23(b)(2) Medical Monitoring (Physical Injury Not Required) Remedy Subclass**

All individuals residing in California; District of Columbia; Guam; Indiana; Kansas; Maryland; Missouri; Nevada; New Jersey; New York; Ohio; Puerto Rico and other Federal territories; Rhode Island; South Carolina; Tennessee; Texas; Vermont; Virgin Islands; Virginia; and Washington who consumed a sufficiently high Lifetime Cumulative Threshold of NDMA or NDEA, in generic valsartan-containing drugs manufactured by or for Defendants and marketed in the United States and its territories and possessions, at least since January 1, 2012. Excluded from this Class are the following: (i) Defendants and their subsidiaries and affiliates; (ii) All persons who make a timely election to be excluded from the Classes; (iii) Governmental entities; and (iv) Any judicial officers who preside over this case and their immediate family members. Also excluded from the Classes are those consumers of Valsartan-Containing Drugs who have

been diagnosed with cancers allegedly as a result of taking Defendants' Valsartan-Containing Drugs containing NDMA or NDEA.